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## **Executive summary for RRT Oil Spill Response for Category EA**

**This document covers and or addresses the main points in the current RRT structure for oil spill response and or its response plans for US navigable waters.**

**The Clean water act/OPAH90 clearly states that any product or process used in oil spill response must remove oil from the environment, and secondly you cannot apply a pollutant to a pollutant!**

**The first step is to define why you remove a spill from the environment, or clean up a spill.**

**You clean up or remove a spill from the environment to reduce the toxicity of the spill to the environment so that living organisms can survive without any adverse effects to their health including single celled organisms.**

**This document and associated documents will prove there is a safe for responders, non toxic to marine life and wildlife means to permanently remove oil from all environments that will sustain life. Category EA a first response bioremediation agent, which contains one product currently OSE II meets and or exceeds all the questions concerns, and requirements set forth in the bioremediation response plan**

**The first part of the document discusses the roles responsibilities of the OSC and the RRT, as well as the applicable regulations, the most important being the Clean Water Act stated above.**

**The responsible party is defined, and in the case of category EA there have been two separate requests for its use, and both were denied by RRT 6 without cause.**

**The bioremediation response document discusses the decision process to use bioremediation, however it is a process carried out in an emergency which**

**defies common sense, since the RRT is established to prepare for oil spills, yet in the last 24 years, never has the pre preparation for an oil spill with bioremediation been carried out. This preparation has now been established with this document based on the exact format of the RRT IV bioremediation document, which is the NRT accepted document for bioremediation.**

**In 2000 Al Venosa of the EPA developed a fact sheet in regards to bioremediation product/processes, however the fact sheet was incomplete since it failed to discuss the third type of bioremediation of which Al Venosa was fully appraised of, category EA/OSE II. The OSEI Corporation pointed out Al Venosa's fact sheets shortcomings and incomplete information within a month of its publication. Al Venosa failed to add the incomplete information to the fact sheet and his failure has mislead RRT's since 2000.**

**RRT's developed guidance documents with Al Venosa's incomplete fact sheet, which has prevented safe, non toxic oil spill response, that actually removes oil from the environment, costing the US in billions of natural resource destruction and costing responsible parties billions of wasted dollars responding to their accidents, costing their stockholders billions.**

**This document shows there is a different type of bioremediation, a first response bioremediation the transcends all the areas for clean up described in the RRT IV/NRT bioremediation response plan, and can clean up all the oil/fuels/hydrocarbon based materials depicted in the bioremediation response plan document.**

**This document shows the availability, logistical concerns, scale of the spill, are all addressed and category EA meets and or exceeds all the requirements. If the RRT wants more category EA closer to spills then it will be incumbent upon them to pre authorize category EA and stage it closer to spill areas, otherwise spills can be handle in a few hours from a warehouse in Dallas, Texas USA.**

**Implementation of category EA has been covered for a number of years since the exact same apparatus to spray dispersants that have been staged can be utilized for category EA, therefore the infrastructure to implement and apply is in place.**

**The bioremediation work plan, covering organization, tactics, personnel, is covered in this plan as well as the biomonitoring plan, which with category EA can be carried out by observation since there is a direct observable effect on the oil when category EA is applied. The monitoring plan also covers how to determine if a given area has been addressed with category EA, the plan is the same in one respect as the dispersant monitoring plan currently in place.**

**There is no reason to discuss feasibility since category EA is feasible for all spill areas and all the spill type of hydrocarbons in this plan, and through EPA, RRT VII/EPA, as well as DOI and EPA 6's use of category EA, and the over 2300 spill clean ups globally with category EA, it has proven to be not just feasible but experienced. The fact that category EA converts hydrocarbons/oil/fuels to CO2 and water has been firmly established by the agencies named above as well as by responsible parties for 24 years, the efficacy of category EA is not in question and has been absolutely proven!**

**The toxicity of category EA has been thoroughly tested by the US EPA including in open water mesocosm toxicity testing of category EA applied to oil and tested for toxicity, and it has proven to be non toxic. This test mimicked a real world spill application without the inevitable dilution in an ocean setting.**

**Category EA is far less toxic than dispersants that have been historically used, therefore based on toxicity to aquatic species category EA becomes a preferable response. The real added benefit is that category EA is non toxic to responders and any associated humans that may accidentally come into contact with overspray, such that occurred on the BP spill. This is a real plus, since safety is supposed to be foremost in establishing a work place for responders and the government personnel reviewing the response and performing monitoring.**

**On April 16 2012, an EPA person from RRT VI stated they could not find a scientific reason not to use category EA/OSE II, and now there is an absolute corrected response plan that covers all the response plans requirements it is time to pre authorize and utilize this tried and true technology of the last 24 years. This product/category EA/OSE II plan is the common sense plan, the public demands and expects to be utilized!**

**Steven Pedigo**